

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF ALABAMA
NORTHERN DIVISION**

**RICHARD BROWN, SR. and
CAROLYN W. BROWN,**

Plaintiffs,

vs.

**MITCHELL BLACKMORE and
UNITED SERVICES AUTOMOBILE
ASSOCIATION,**

Defendants.

CASE NO.: 2:07 CV79-MEF

NOTICE OF PROCEEDING

Defendant Mitchell Blackmore ("Mr. Blackmore"), to the extent required by **Alabama Code**, §6-6-227 (1975), hereby serves notice upon the Attorney General of the State of Alabama that he is challenging the constitutionality of the recovery of punitive damages in this case, as more specifically set forth in the Answer filed on behalf of Mr. Blackmore, which is attached and incorporated by reference.

DATED: March 15, 2007.

Respectfully submitted,

/s/ Gayle L. Douglas

E. Britton Monroe (MON032)

Taffi S. Stewart (SMI171)

Gayle L. Douglas (DOU012)

Attorneys for Mitchell Blackmore

OF COUNSEL:

Lloyd, Gray & Whitehead, P.C.
2501 20th Place South, Suite 300
Birmingham, Alabama 35223
(205) 967-8822

CERTIFICATE OF SERVICE

I hereby certify that on the 15th day of March 2007, a copy of the foregoing was electronically served upon the foregoing pursuant to the CM/ECF filing system of the United States District Court for the Middle District of Alabama:

Michael J. Crow, Esq.
Beasley, Allen, Crow, Methvin, Portis & Miles, P.C.
Post Office Box 4160
Montgomery, Alabama 36103-4160

/s/ Gayle L. Douglas

OF COUNSEL

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